IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA



DALE ARNOLD,

Petitioner

Civil No. 1:00-CV-0775

v.

Magistrate Judge Smyser

FREDERICK FRANK,
BRADFORD COUNTY DISTRICT
ATTORNEY and ATTORNEY GENERAL
OF THE COMMONWEALTH OF
PENNSYLVANIA,

FILED HARRISBURG, PA

AUG 1 7 2000

Respondents

MARY E. D'ANDREA. CLEEK

PETITIONER'S MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE SUPPORTING BRIEF

AND NOW comes the petitioner, Dale Arnold, by his attorney Daniel I.

Siegel of the Federal Public Defender's Office, and files this Motion for Extension
of Time Within Which to File Supporting Brief.

- 1. A supporting brief in the above-captioned case is due to be filed on or before August 18, 2000.
- 2. The Federal Public Defender has secured from the clerk's office copies of all documents on file with the Federal Court.
- 3. Defense counsel needs additional time to investigate the claims, review relevant documents, and consult with the client.

WHEREFORE, it is respectfully requested that the deadline for filing petitioner's supporting brief be extended to Friday, September 22, 2000.

Respectfully submitted,

Date: Aug. 17, 2000

Daniel I. Siegel, Esquire

Asst. Federal Public Defender 100 Chestnut Street, Suite 306

Harrisburg, PA 17101

Attorney for Dale Arnold

Attorney ID # 38910

CERTIFICATE OF CONCURRENCE

I, Daniel I. Siegel, of the Federal Public Defender's Office certify that on August 17, 2000, I contacted Stephen Downs, District Attorney for Bradford County, and he stated that he would concur in the foregoing motion.

Date: Nug. 17, 2000

DANIEL I. SIEGEL, ESQUIRE Asst. Federal Public Defender

CERTIFICATE OF SERVICE

I, Daniel I. Siegel, of the Federal Public Defender's Office do hereby certify that on this date I served a copy of the **PETITIONER'S MOTION FOR**

EXTENSION OF TIME WITHIN WHICH TO FILE SUPPORTING BRIEF

by placing the same in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

> Stephen Downs, Esquire District Attorney Bradford County Courthouse 301 Main Street Towanda, PA 18848

> Dale Arnold Inmate #AK 5044 SCI Huntingdon 1100 Pike Street Huntingdon, PA 16654-1112

Date: Xug. 17, 2000

DANIEL I. SIEGEL, ESQUIRE Asst. Federal Public Defender Attorney for Dale Arnold